

FILED

OCT 14 2015

JULIE RICHARDS JOHNSON, CLERK
US DISTRICT COURT, EDNC
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:15-CR-292-UA

UNITED STATES OF AMERICA

v.

KURT MICHAEL KROL

)
)
) C R I M I N A L
) I N F O R M A T I O N
)
)

The United States Attorney charges:

[**Trafficking in Counterfeit Goods; 18 U.S.C. § 2320(a)(1)**]

Beginning at a time unknown, but no later than on or about September 20, 2012, and continuing to a time unknown, but no earlier than on or about February 10, 2015, in the Eastern District of North Carolina and elsewhere, KURT MICHAEL KROL, defendant herein, did intentionally traffic in, and attempt to traffic in, goods and knowingly use a counterfeit mark on and in connection with such goods, including but not limited to:

- a) a quantity of counterfeit Clarisonic Deep Core Cleansing facial brushes;
- b) a quantity of counterfeit Clarisonic Mia 1;
- c) a quantity of counterfeit Clarisonic Mia 2;
- d) a quantity of counterfeit FURminator brushes;
- e) a quantity of counterfeit Garmin Astro magnetic mount antennas;

- f) a quantity of counterfeit HSI Ceramic Iron;
- g) a quantity of counterfeit JBL Micro Wireless Bluetooth speakers;
- h) a quantity of counterfeit LG Tone+ Wireless headphones;
- i) a quantity of counterfeit Otterbox cellphone and tablet cases;
- j) a quantity of counterfeit Phillips Sonicare toothbrush heads;
- k) a quantity of counterfeit Rainbow Loom; and
- l) a quantity of counterfeit ZingAnything Citrus Zinger bottles.

All in violation of Title 18, United States Code, Section 2320(a)(1).

FORFEITURE NOTICE

Upon conviction of the offense alleged in this Information, defendant shall forfeit to the United States, pursuant to 18 U.S.C. §§ 2320(c) and 2323(b), any article, the making or trafficking of which is prohibited under the offense alleged; any property used, or intended to be used, in any manner or part to facilitate the commission of the offense; and any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said offense. Such property includes, but is not limited to:

1. All counterfeit articles seized, including all parts and accessories;
2. Proceeds of \$156,932.00 seized from BB&T account numbers 5101511016, 5105531046, 5297522797, and 5202082396;
3. Proceeds of \$51,988.00 seized from USAA account numbers 0025784544 and 0043624219;
4. 201 Forest Creek Drive, Fayetteville, North Carolina, being legally described in book 9190, page 825 of the Cumberland County registry, North Carolina;
5. 179 Oakridge Drive, Raeford, North Carolina, being legally described in book 963, page 350 of the Hoke County registry, North Carolina; and
6. A money judgment in the amount of the gross proceeds of the offense.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p),

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to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

THOMAS G. WALKER
United States Attorney

A handwritten signature in black ink, appearing to be 'S. Kielmanovich', written over a horizontal line.

BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney
Criminal Division